

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID E. KAPLAN, et al.,

Plaintiffs,

- against -

S.A.C. CAPITAL ADVISORS, L.P., et al.,

Defendants.

No. 12 Civ. 9350 (VM)
(KNF)

BIRMINGHAM RETIREMENT AND RELIEF
SYSTEM, et al.,

Plaintiffs,

- against -

S.A.C. CAPITAL ADVISORS, L.P., et al.,

Defendants.

No. 13 Civ. 2459 (VM)
(KNF)

Oral Argument Requested

DECLARATION OF GEOFFREY CHEPIGA

I, Geoffrey Chepiga, declare as follows:

1. I am a lawyer at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys for SAC in this action. I submit this declaration in support of SAC's Objections to Magistrate Judge Fox's June 26, 2015 Order Denying Production of Plaintiffs' Litigation Funding Documents.

2. Attached hereto as Exhibit A is a true and correct copy of SAC's First Set of Document Requests to Plaintiff David E. Kaplan dated September 19, 2014.

3. Attached hereto as Exhibit B is a true and correct copy of a letter from Michael E. Gertzman to Ethan D. Wohl dated January 9, 2015.

4. Attached hereto as Exhibit C is a true and correct copy of a letter from Gregg S. Levin to Michael E. Gertzman dated January 23, 2015.

5. Attached hereto as Exhibit D is a true and correct copy of the email from Paul Paterson to Gregg S. Levin dated January 30, 2015.

6. Attached hereto as Exhibit E is a true and correct copy of a letter from Gregg S. Levin to Paul Paterson dated February 5, 2015.

7. Attached hereto as Exhibit F is a true and correct copy of a letter from Audra J. Soloway to Hon. Kevin N. Fox dated February 17, 2015.

8. Attached hereto as Exhibit G is a true and correct copy of a letter from Ethan D. Wohl to Hon. Kevin N. Fox dated February 20, 2015.

9. Attached hereto as Exhibit H is a true and correct copy of SAC's Memorandum of Law in Support of its Motion to Compel the Litigation Funding Documents dated May 25, 2015 (ECF No. 187).

10. Attached hereto as Exhibit I is a true and correct copy of plaintiffs' Memorandum of Law in Opposition to SAC's Motion to Compel the Litigation Funding Documents dated May 25, 2015 (ECF No. 186).

11. Attached hereto as Exhibit J is a true and correct copy of a letter from Ethan D. Wohl to Hon. Kevin N. Fox dated May 26, 2015.

12. Attached hereto as Exhibit K is a true and correct copy of Magistrate Judge Fox's Order denying SAC's Motion to Compel the Litigation Funding Documents dated June 26, 2015 (ECF No. 190).

13. Attached hereto as Exhibit L is a true and correct copy of a letter from Ethan D. Wohl to Hon. Kevin N. Fox dated February 17, 2015.

14. Attached hereto as Exhibit M is a true and correct copy of a letter from Richard M. Strassberg to Hon. Kevin N. Fox dated February 20, 2015.

15. In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
July 10, 2015



Geoffrey Chepiga